



# SIG TAU

## WPN HOUSING

### **WPN Policies**

WPN Management Company, LLC

## Security Cameras and Surveillance Systems Policy

Surveillance systems may be considered when it is believed there is a need to enforce compliance with chapter, company or organizational policies, contracts, or law or deter mistreatment of the chapter facility by anyone on the premises which is occupied by the chapter. Chapter facilities may be permitted to have a security camera surveillance system with written approval by WPN. If such system is installed, WPN shall be the owner of the system in all aspects including monitoring and materials.

If a camera recording system is installed at the premises, the following practices and policies should be adopted and followed:

- I. Cameras shall only be used in public areas, inside or out, where it is thought best to deter property damage or illegal activity. The interior and exterior of building entrances, hallways, and parking areas are examples of helpful locations without being too intrusive. No camera should permit view of areas where people are normally unclothed, like bedrooms or bathrooms. Care will be taken to eliminate views by exterior cameras of bedrooms, bathrooms or over privacy fences of neighboring properties. Care should also be taken to eliminate views by interior cameras of bedrooms, bathrooms, or other private areas when doors to such areas are opened.
- II. Reasonably clear signs shall be posted in areas subject to surveillance. The signs should make reasonable efforts to assure that no one in the areas under view of the cameras should have any expectation of privacy in those areas. Signage shall explain:
  - a. People on the premises are being recorded
  - b. Areas in view of the camera are not private
  - c. Cameras are not monitored
  - d. Call 911 if an emergency exists
- III. Cameras shall not be actively monitored.
- IV. The video recording shall be viewed when damage occurs, when an injury occurs or is alleged of which the Chapter or WPN becomes aware, or when the Chapter or WPN becomes aware of an incident that merits review of the data.
- V. To comply with laws against wiretapping, there shall be no audio recording.
- VI. The video recording data shall be configured to preserve the maximum possible resolution and frame repeat rate but still preserve a minimum of 48 hours of most recent activity in view of the cameras.
- VII. The equipment and software shall provide for automatic overwrite of the data so that the recording of the most recent period of time is preserved and the memory does not become full and fail to capture current images.

- VIII.** The recording resolution for the camera and memory should be set at the maximum allowable resolution in order to show details such as facial features or tattoos, while preserving at least 48 hours of recording retention time.
- IX.** A reserve memory device (disk, card, drive, etc.) shall be immediately available to place in the system so that the memory device immediately prior in use can be pulled from the system and preserved whenever the chapter or WPN is made aware of property damage, injury on the premises or allegations of misconduct which might justify disciplinary action or criminal charges against anyone. Any memory device pulled from the recording system under such investigating circumstances shall be preserved until otherwise instructed by legal counsel to the chapter or WPN.
- X.** The chapter or WPN shall not produce any video recording to third parties (meaning parties other than chapter members, a property manager, a resident at the premises, headquarters staff, or legal counsel to the chapter or WPN), whether or not subject to the preservation protocol described in the immediately preceding sentence, except in response to a valid and properly served subpoena or discovery request, or in response to a law enforcement officer having jurisdiction over the premises when conducting a criminal investigation. Notwithstanding the foregoing generally applicable restriction, the chapter or WPN may use the recording in its own investigation and, in doing so, show the recording to others as generally described in Section XI below.
- XI.** All video recordings gathered shall be the exclusive property of the owner of the camera system, and only authorized officers of the chapter and WPN representatives shall have access to the recording except as set forth herein. The Chapter and WPN and their representatives shall use reasonable care to keep the recording private and confidential unless:
- it is produced in response to a subpoena or discovery request as described above, or
  - it is produced in response to a law enforcement officer conducting a criminal investigation as described above, or
  - its use is necessary to follow up on redress of an injury and/or property mistreatment. Any access to the recording under subsection X, or as set forth in the immediately preceding sentence shall be limited to those persons identified by the owner of the camera system or the owner of the premises. Beyond the executive cabinet officers of the chapter or representatives of WPN, access to video recording would generally be limited to the property manager of the premises, and any chapter member who those with primary access to the recording believe can help identify perpetrators or people recorded, though this should not be viewed as a comprehensive list of all persons who may be shown the recording.
- XII.** Tenants and chapter members shall be encouraged to immediately report any damage to the chapter, WPN or the property manager with the estimated date and time of the incident.
- XIII.** The video recording system shall be inspected on a routine basis to help ensure its proper operation.